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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

13 In re:
14 **PG&E CORPORATION,**

15 -and-

16
17 **PACIFIC GAS AND ELECTRIC**
18 **COMPANY,**

19 **Debtors.**

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF CATHY
YANNI IN SUPPORT OF EX
PARTE MOTION OF THE FIRE
VICTIM TRUSTEE TO REDACT
PERSONAL ADDRESS FROM
ENGAGEMENT LETTER TO BE
FILED WITH COURT**

20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors

[No Hearing Requested]

23 ** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

24
25 I, Cathy Yanni, hereby declare under penalty of perjury that the following is true to the best
26 of my knowledge, information, and belief:

27 1. I became Successor Trustee of the PG&E Fire Victim Trust (“**Trustee**”) on July 1,
28 2022, pursuant to Section 5.2(d) of the Fire Victim Trust Agreement [Docket No. 8750-1). I am

1 duly authorized to make this Declaration (the “**Declaration**”) on behalf of the PG&E Fire Victim
2 Trust (the “**Trust**,” and its beneficiaries, the “**Fire Victims**”). Unless otherwise stated in this
3 Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would testify
4 thereto.

5 2. I am an attorney at law licensed to practice law in the state of California. Since 1998
6 I have been a neutral with JAMS, which specializes in the resolution of claims and legal disputes
7 by providing efficient, cost-effective and impartial ways of overcoming barriers at any stage of
8 conflict. I have extensive experience resolving mass tort claims, and have acted as a special master,
9 mediator and administrator in multiple cases involving tens of thousands of claims, including claims
10 for personal injury, property damage and business loss.

11 3. Prior to becoming Trustee, I served as the Court-appointed Claims Administrator for
12 the Trust under the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization*
13 *Dated June 19, 2020* [Docket No. 8048] and, prior to that, pursuant to this Court’s *Order Granting*
14 *Application of The Official Committee of Tort Claimants Pursuant to 11 U.S.C. Sections 1103 and*
15 *363 and Fed. R. Bankr. P. 2014 and 5002 to Retain and Employ Cathy Yanni as Claims*
16 *Administrator Nunc Pro Tunc to January 13, 2020* dated April 14, 2020 [Docket No. 6759]. Before
17 serving as the Claims Administrator, I served as the Court-appointed Administrator of the Wildfire
18 Assistance Program pursuant to this Court’s *Supplemental Order (A) Approving Appointment of*
19 *Administrator and Establishing Guidelines for the Wildfire Assistance Program and (B) Granting*
20 *Related Relief* dated June 5, 2019 [Docket No. 2409].

21 4. I submit this Declaration in support of the *Ex Parte Motion of the Fire Victim Trustee*
22 *to Redact Personal Address from Engagement Letter to be Filed with the Court* (the “**Motion**”),
23 filed concurrently herewith, which seeks authority to redact a personal address from an engagement
24 letter to be filed with the Court as directed by the *Order on Motion for Reconsideration* [Docket
25 No. 12929].

26 5. I am generally knowledgeable and familiar with the day-to-day operations of the
27 Trust, including the Trust’s entry into the engagement letter referenced in the Motion. I am
28 authorized to submit this Declaration on behalf of the Trust.

1 6. The facts set forth in this Declaration are based upon my personal knowledge, my
2 review of relevant documents, and information provided to me by the Trust's legal advisors. If called
3 upon to testify, I would testify to the facts set forth in this Declaration.

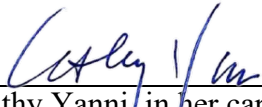
4 7. I believe that disclosing the personal address of the Authorized Agent could subject
5 him to unsolicited contact that may be perceived as intrusive or harassing as a result of his
6 connection to the Trust and to the third-party litigation that was a subject of the *Motion of William*
7 *B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an Order*
8 *Authorizing Discovery and Hearings Regarding the Administration of The Fire Victim Trust* [Dkt.
9 No. 12440] and the *Motion for Reconsideration and Related Relief from the Order Granting Motion*
10 *of the Fire Victim Trustee to File Redacted Versions of Certain Retention Agreements Until*
11 *Litigation Related to Such Retention Agreements is Finally Resolved and Pursuant to Federal Rule*
12 *of Civil Procedure 59(e).*

13 8. In addition, I believe that the personal information sought to be redacted from the
14 engagement letter is wholly irrelevant to the "provisions for compensation" that the Trust was
15 directed to file.

16 9. For these reasons, I believe the redaction of the personal address of the Authorized
17 Agent is warranted.

18 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true
19 and correct to the best of my knowledge, information, and belief.

20
21 Executed this 15th day of September, 2022, in San Francisco, California.

22
23
24 By: 
25 Cathy Yanni, in her capacity as
26 Trustee of the PG&E Fire Victim Trust
27
28